

Redacted Version of the Declaration of Natalie Hausknecht

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Attorneys for Defendant Meta Platforms, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE META PIXEL TAX FILING CASES

Case No. 5:22-cv-07557-PCP (VKD)

This Document Relates To:

Case No. 5:22-cv-07557-PCP, All Actions

**DECLARATION OF NATALIE
HAUSKNECHT IN SUPPORT OF
DEFENDANT META PLATFORMS, INC.'S
OPPOSITION TO PLAINTIFFS' MOTION
FOR VOLUNTARY DISMISSAL OF
CRYSTAL CRAIG**

Date: July 31, 2025

Time: 10:00 a.m.

Courtroom 8, 4th Floor

Date Action Filed: December 1, 2022

Honorable P. Casey Pitts

**REDACTED VERSION OF DOCUMENT FILED UNDER
SEAL**

1 I, Natalie Hausknecht, declare as follows:

2 1. I am an attorney admitted to practice law in the state of Colorado. I am admitted pro hac
3 vice in the United States District Court for the Northern District of California. I am a partner at the
4 law firm Gibson, Dunn & Crutcher LLP and counsel for Meta Platforms, Inc. (“Meta”) in the above-
5 captioned action.

6 2. I make this declaration in support of Meta’s Opposition to Plaintiffs’ Motion for
7 Voluntary Dismissal of Plaintiff Crystal Craig, filed in this District on June 20, 2025. Unless otherwise
8 stated, I have personal knowledge of the facts stated herein and, if called as a witness, I could and
9 would testify competently to them.

10 3. On December 17, 2024—six months ago and almost two years after Craig joined this
11 case—Meta served Craig with a deposition notice. The deposition notice did not include a date and
12 instead indicated that the deposition would take place “on a date and time to be determined, with parties
13 to confer about that date.” After Meta requested dates for Craig’s deposition several times, on March
14 27, plaintiffs proposed May 2 for Craig’s deposition. On May 1, while the parties were actively
15 working to identify mutually agreeable deposition dates for all the named plaintiffs in the case,
16 plaintiffs told Meta for the first time that “Craig is unable to proceed with the litigation and therefore
17 seeks to be dismissed from the action.”

18 4. The parties met and conferred about Craig’s withdrawal three times. In the first
19 meeting, on May 7, plaintiffs would not provide any specific information about Craig’s reasons for
20 withdrawing. In the second, on May 15, plaintiffs agreed to consult with Craig about why she was
21 refusing to appear for her deposition. In the third, on June 4, plaintiffs finally informed Meta that Craig
22 did not want to continue as a named plaintiff in the case because of [REDACTED]

23 [REDACTED]
24 They also explained that Craig has [REDACTED]

25 [REDACTED] In response to this new information, Meta informed
26 plaintiffs that it was willing to consent to her withdrawal with prejudice if Craig would agree to sit for
27 a more limited deposition where Meta would make certain accommodations for her, including
28 scheduling the deposition remotely, holding the deposition outside of business hours, and/or conducting

1 the deposition in multiple sessions, if necessary. Meta also informed plaintiffs that it would serve an
2 amended deposition notice for Craig on June 6, but offered to notice her deposition for a date
3 convenient for Craig if such a date was provided. Plaintiffs responded that they would confer with
4 Craig to see if she would agree to sit for a deposition, subject to Meta's proposed accommodations,
5 and get back to Meta by June 6.

6 5. Plaintiffs never responded to Meta about its offer.

7 6. On June 6, Meta met with plaintiffs during the break in a deposition in this matter. Meta
8 raised the fact that plaintiffs had filed their motion to dismiss without responding to Meta's offer,
9 despite plaintiffs' commitment to respond to that offer on the last meet and confer and meet and confer
10 again on whether the parties could come to an agreement on reasonable conditions for Craig's
11 dismissal. Plaintiffs informed Meta that the motion was its "response" to Meta's offer, despite the fact
12 that plaintiffs' motion did not even mention Meta's offer to provide accommodations to Craig, and
13 plaintiffs never stated that counsel had even presented Meta's compromise offer to Craig prior to filing
14 the motion to dismiss her. Plaintiffs instead stated only that some of the other plaintiffs' counsel did
15 not want to honor plaintiffs' position to Meta on the final meet and confer to consider Meta's offer of
16 accommodations and instead decided to file the motion without responding to the offer.

17 7. On June 6, Meta also noticed Craig's deposition for June 26 since plaintiffs had stated
18 they did not intend to propose any date. In that email, Meta reiterated its willingness to provide
19 accommodations to Craig to facilitate her ability to sit for a deposition. Meta also sought to set the
20 record straight with respect to Craig's motion, including that in the motion plaintiffs made no mention
21 of (1) Meta's willingness to accommodate Craig; (2) plaintiffs' representation that they would confer
22 with Craig to see if she would agree to a deposition with accommodations and get back to Meta on
23 June 6; and (3) Meta's plan to send an amended deposition notice.

24 8. On June 10, plaintiffs responded to Meta's amended deposition notice and informed
25 Meta that, unless it postponed the scheduled deposition to late August or September (after plaintiffs
26 file their class certification brief), they would move for a protective order and to quash the deposition
27 notice. Meta responded that it remains willing to reschedule Craig's deposition for a time that would
28

1 be convenient for her, as long as the deposition occurs sufficiently in advance of when plaintiffs'
2 motion for class certification is due.

3 9. In support of their claims, plaintiffs have propounded dozens of discovery requests on
4 Meta, including requests for all data related to Craig. Meta, in turn, produced structured data for each
5 of the named plaintiffs, including Craig, and the tax-service providers that allegedly shared their
6 information with Meta, including H&R Block.

7 10. Meta's investigation into Craig revealed that she may have taken certain actions to
8 protect her privacy or limit the data shared with third parties that her co-plaintiffs did not. For example,
9 there is evidence that Craig customized her settings to block third-party cookies and auto-delete each
10 time she closed her browser. There is also evidence that she enabled and disabled a Facebook user
11 privacy control that, when enabled, prevents Meta from associating a user's future offsite events with
12 their Facebook account and clears that user's history.

13 11. Meta's investigation also revealed that Craig posted on social media (and Meta services)
14 about her personal experience and issues with filing taxes specifically, including that she had issues
15 with child support and sought legal assistance to prevent her child's father from claiming the child as
16 a dependent. Craig also asked for help on Facebook with certain tax-related questions, including which
17 state would tax her, whether and how to claim college and student loans, when she would receive her
18 child tax credit, and how to use certain online tax-filing services.

19 I declare under penalty of perjury that the foregoing is true and correct, and that I executed this
20 Declaration on June 20, 2025, in Des Moines, Iowa.

21
22 /s/ Natalie J. Hausknecht

23 Natalie J. Hausknecht
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